

Stephen P. Berzon

From: Spagat, Robert [RSpagat@winston.com]
Sent: Saturday, May 26, 2007 3:22 PM
To: Linda Lye; Stephen P. Berzon; Claire Prestel; elizabeth.ginsburg@alpa.org
Cc: Doug Hall; Tannis, Thelma
Subject: SkyWest: Proposed Alternate Briefing and Hearing Schedule

Dear Counsel:

We believe that SkyWest has a meritorious motion to transfer that should be heard before the hearing on Plaintiff's motion for a preliminary injunction. As an alternative to the briefing schedule we previously proposed, we would like to propose the following to ensure that the rights of all parties to be heard are fairly protected.

Defendant's Motion to Transfer:
Opening Brief to be filed on Sunday, May 27

Plaintiff's Opposition to be filed Wednesday, May 30

SkyWest's Reply to be filed Thursday, May 31

Hearing Monday, June 4 (assuming court can calendar it)

Plaintiff's Motion for a PI:
SkyWest's Opposition to be filed on Friday, June 1 Plaintiff's Reply to be filed on Tuesday, June 5 May 31 hearing date vacated; hearing to be rescheduled June 6, or as soon thereafter as the court can schedule it

The TRO will remain in effect until the PI hearing.

Please advise us whether you will agree to this proposal at your earliest convenience.

-----Original Message-----

From: Linda Lye [mailto:llye@altshulerberzon.com]

Sent: Friday, May 25, 2007 2:48 PM
To: Spagat, Robert; Stephen P. Berzon; Claire Prestel; elizabeth.ginsburg@alpa.org
Cc: Doug Hall
Subject: RE: SkyWest Motion to Transfer

Dear Mr. Spagat,
SkyWest's motion to transfer can and should be heard on a regular motion schedule. We are not agreeable to shortening time and will oppose a request to shorten time.
Regards,
Linda Lye

-----Original Message-----

From: Spagat, Robert [mailto:RSpagat@winston.com]

Sent: Friday, May 25, 2007 2:15 PM

To: Stephen P. Berzon; Linda Lye; Claire Prestel; elizabeth.ginsburg@alpa.org

Cc: Doug Hall

Subject: SkyWest Motion to Transfer

Ladies and Gentlemen:

We will be substituting in as local counsel (replacing Reed Smith LLP only) in SkyWest Pilots ALPA Organizing Committee et al. v. SkyWest Airlines, Inc., Northern District of California Case No.

3:07-CV-02688-CRB. SkyWest Airlines, Inc. ("SkyWest") intends to file a motion to transfer venue. We would like to have the motion heard on shortened time so that it can be heard on Thursday, May 31, 2007, before the hearing on the preliminary injunction. We are making every effort to file the motion today. Please advise as to whether Plaintiffs will stipulate to having the motion heard on shortened time. Our proposed briefing schedule would be:

SkyWest's moving papers due Saturday, May 26 by noon (again, we will make every effort to file them today) Plaintiff's opposition papers due Tuesday, May 29 by 4:00 p.m. SkyWest's reply papers due Wednesday, May 30, 2007, by noon.

We would appreciate hearing from you at your earliest convenience, but in any event, before the close of business today.

Robert Spagat
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